

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:14CR389 CDP/TCM
)	
IVAN GUDALOV,)	
)	
Defendant.)	

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COMES NOW defendant, by and through his attorney, and states to the Court as follows:

1. At arraignment in this matter, the Court directed that defendant shall file pretrial motions, or a waiver of said motions, by December 29, 2014. The Court has not yet scheduled a hearing of said motions, and there is no scheduled trial setting.
2. The government has provided its initial discovery disclosure in this case. The indictment in this matter charges defendant and others with a wide ranging, ongoing conspiracy to commit illegal activities that occurred in numerous locations throughout the country over the course of nearly one year. The majority of the government's discovery has not yet been disclosed to defendants.
3. Defendant is currently unable to determine what, if any, pretrial motions should be filed, or if a waiver of said motions should be filed. Counsel for defendant has discussed with counsel for the government his intent to ask this Court to continue the due date for filing of pretrial motions, and has been advised that his office has no objection to the Court granting this request.

4. Defendant would request that this Court make a finding pursuant to 18 U.S.C. § 3161(h)(7) that any continuance of this matter is “excludable time” for purposes of speedy trial calculation.

5. Defendant believes that an additional forty-five (45) days should provide sufficient time for the government to provide its discovery in this case, and for defendant to determine what, if any, pretrial motions should be filed.

WHEREFORE, prays this Honorable Court for an additional forty-five (45) days, up to and including February 12, 2015, in which to file pretrial motions in this matter, and for such other and further relief and orders as the Court deems just and proper.

/s/ Eric W. Butts
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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2014, a copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon the following: Mr. Richard E. Finneran, Assistant United States Attorney, 111 South 10th Street, 20th Floor, St. Louis, Missouri 63102.

/s/ Eric W. Butts